

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DODORA UNIFIED
COMMUNICATIONS, INC.

Plaintiff,

v.

DIRECT INFORMATION PVT. LTD., et
al”

Defendants.

Civil Action
No. 05-10016-NMG

PLAINTIFF’S NOTICE OF INTENT TO REQUEST SANCTIONS
PURSUANT TO FED.R.CIV.P. 11

NOW COMES Dodora Unified Communications, Inc., (hereinafter “Dodora”) and gives notice of its intent to request sanctions against the defendant and/or its attorney, pursuant to Fed.R.Civ.P. 11 and/or 28 USC 1927, because the “Defendant’s Request for Findings Under Mass G. L. c. 231, §6f” is being presented for an improper purpose, specifically to harass and vex the plaintiff, and the claims, defenses, and other legal contentions therein are not warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law. *See Monahan Corp. N.V. v. Whitty*, 319 F.Supp.2d 227 (D.Mass. 2004). Pursuant to the “safe harbor” provisions of Rule 11, the defendant is required to withdraw or appropriately correct the request within 21 days, failing which a motion for sanctions will be filed.

This notice is being filed in the event that the response time on the defendant's request is less than 21 days.

June 13, 2005

Respectfully submitted,
DODORA UNIFIED COMMUNICATIONS, INC.
By its attorney;

/s/ David G. Baker
David G. Baker, Esq.
105 Union Wharf
Boston, MA 02109
BBO # 634889
617-367-4260

Certificate of Service

The undersigned hereby states upon information and belief that the within Notice was served upon counsel for Direct Information by the Court's CM/ECF system and by email to dhecker@pbl.com.

/s/ David G. Baker
David G. Baker, Esq.